

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN CARDENAS-VEGA,

Defendant.

No. 3:23-mj-00590-KFR

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jeff Ketelsen, having been first duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Department of Homeland Security (DHS), Homeland Security Investigations (HSI), currently employed in the Anchorage, Alaska Office of the Resident Agent in Charge (RAC).
2. I have been employed as a criminal investigator with HSI, from May 2008 to the present. I am currently assigned to HSI Anchorage, Alaska. As a Special Agent with HSI, I am responsible for enforcing the laws of the United States. My criminal investigative training includes twenty-five weeks at the Federal Law Enforcement Training Center in Brunswick, Georgia. Over 500 hours were focused on the Criminal Investigator Training Program and over an additional 500 hours of training focused on the HSI Special Agent Training Program. The training included proper practical application of investigative guidelines, procedures, and techniques.

3. In addition to the Criminal Investigator training, I have also graduated the Uniformed Police Officer Training program at the Federal Law Enforcement Training Center, which consisted of approximately 500 hours of law enforcement training. I also hold a State of Georgia Police Officer certification and I have accumulated approximately 2200 hours of law enforcement training on my Georgia Police Officers Standards and Training Counsel (POST) transcript.

4. I make this affidavit in support of an application for a criminal complaint and arrest warrant pursuant to Federal Rules of Criminal Procedure 3 and 4. As explained more fully below, I have probable cause to believe that Juan Cardenas-Vega has committed the following federal criminal offense:

**Count 1:** That on or about October 12, 2023, within the District of Alaska, at or near Anchorage, the defendant, JUAN CARDENAS-VEGA, having been deported and removed from the United States subsequent to a conviction for a felony, thereafter entered and was found in the United States without the express consent of the Attorney General or the Secretary of Homeland Security, all of which is in violation of 8 U.S.C. § 1326(a), (b)(1).

5. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, and records maintained by government agencies, including the Department of Homeland Security and the U.S. District Court. Because the affidavit is intended to establish probable cause to support a complaint and secure an arrest warrant, I have not included each and every fact known to me concerning this investigation.

#### **FACTS ESTABLISHING PROBABLE CAUSE**

6. On or about 09/26/2023, the HSI, RAC/Anchorage Office was notified by a source

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of information that a subject identified as Juan CARDENAS-VEGA (hereinafter Mr. CARDENAS-VEGA) was a Mexican national who was unlawfully in the United States and had been previously removed from the United States to Mexico.

7. Mr. CARDENAS-VEGA was convicted of False Claim of U.S. Citizenship in violation of 18 U.S.C. § 911 in the U.S. District Court for the District of Alaska on March 31, 2011, in case 3:11-cr-00013-HRH.

8. Preliminary investigative efforts indicated that Mr. CARDENAS-VEGA did have a recorded immigration history, and thus had an alien file (afile) assigned to him in the past, A200296616. The HSI RAC/Anchorage Office requested and received CARDENAS-VEGA's afile from U.S. Citizenship and Immigration Services (CIS).

9. Reviewing Mr. CARDENAS-VEGA's afile, I discovered that Mr. CARDENAS-VEGA was alleged to have first entered the United States at Menagers, Arizona on or about October 10, 2011, without inspection. Also contained in the afile was an order issued by Acting Border Patrol Agent in Charge on October 14, 2011, ordering that Mr. CARDENAS-VEGA be removed back to Mexico. On October 17, 2011, Mr. CARDENAS-VEGA was indeed removed to Mexico.

10. According to the afile, on or about May 16, 2014, Mr. CARDENAS-VEGA reentered the United States at or near Lukeville, Arizona. On May 18, 2014, it was determined that Mr. CARDENAS-VEGA was subject to removal through reinstatement of the prior order by Acting Border Patrol Agent in Charge Leigh Erbe. Mr. CARDENAS-VEGA was removed on November 13, 2014, back to Mexico.

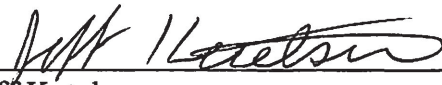
11. According to the afile, on or about January 29, 2016, Mr. CARDENAS-VEGA reentered the United States at or near Roma, Texas. On January 29, 2016, it was determined that Mr. CARDENAS-VEGA was subject to removal through reinstatement of the prior order by Supervisory Border Patrol Agent Lisandro Lopez. Mr. CARDENAS-VEGA was removed on January 29, 2016, back to Mexico.

12. On October 12, 2023, federal law enforcement contacted Mr. CARDENAS-VEGA in Anchorage, Alaska. Mr. CARDENAS-VEGA had not received permission from the appropriate cabinet official to reenter the United States prior to this contact.

### CONCLUSION

13. For the reasons described above, based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Juan Cardenas-Vega has committed the offenses described in the attached complaint. Accordingly, I ask the Court to issue the complaint and a warrant for Juan Cardenas-Vega's arrest in accordance with Federal Rule of Criminal Procedure 4(a).

RESPECTFULLY SUBMITTED,

  
\_\_\_\_\_  
Jeff Ketelsen  
Special Agent, HSI

Affidavit submitted by email/pdf and  
attested to me as true and accurate by  
telephone consistent with  
Fed.R.Crim.P. 4.1 and 4(d)

October 13, 2023  
this \_\_\_\_ day of October, 2023.

